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1 **VENABLE LLP**
2 Thomas E. Wallerstein (SBN 232086)
3 Kimberly Culp (SBN 238839)
4 Email: twallerstein@venable.com
5 kculp@venable.com
6 505 Montgomery Street, Suite 1400
7 San Francisco, CA 94111
8 Telephone: 415.653.3750
9 Facsimile: 415.653.3755

6 | Attorneys for Defendant Almawave USA, Inc.

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10
11 **LOOP AI LABS, INC., a Delaware**
 corporation.

CASE NO.: 3:15-cv-00798-HSG (DMR)

Plaintiffs

**ALMAWAVE USA, INC.'S
INTERROGATORIES TO PLAINTIFF
LOOP AI LABS, INC., SET NO. ONE**

16 ANNA GATTI, an individual,
17 ALMAVIVA S.p.A., an Italian corporation,
18 ALMAWAVE S.r.l., an Italian corporation,
19 ALMAWAVE USA, Inc., a California
corporation, IQSYSTEM LLC, a California
limited liability company, IQSYSTEM Inc., a
Delaware corporation.

Action Filed: February 20, 2015
Trial Date: July 11, 2016

Defendants.

24 | PROPOUNDING PARTY: ALMAWAVE USA, INC.

25 | RESPONDING PARTY: LOOP AI LABS, INC.

26 | SET NO.: ONE

1 **TO PLAINTIFF AND ITS ATTORNEY OF RECORD:**

2 Pursuant to Federal Rule of Civil Procedure 33, Defendant Almawave USA, Inc.
3 (“Almawave USA”) hereby requests that Plaintiff Loop AI Labs, Inc. (“Loop”) respond to the
4 following Interrogatories (“Interrogatories”) fully and separately, in writing and under oath,
5 within 30 days after service upon you.

6 **DEFINITIONS**

7 The following definitions apply to the Interrogatories herein:

8 “ALMAWAVE” means Almawave USA, Inc., Almaviva S.p.A, Almawave S.r.l and any
9 of their predecessors, successors, related entities, sister or parent entities, agents, assigns,
10 officers, directors, employees, or any individual or entity acting on their behalf or under their
11 direction or control.

12 “ALMAWAVE ENTITIES” means Almawave USA, Inc., Almaviva S.p.A, Almawave
13 S.r.l and any of their predecessors, successors, related entities, sister or parent entities.

14 “LOOP” means Loop AI Labs, Inc. and any of its predecessors, successors, agents,
15 assigns, officers, directors, employees, or any individual or entity acting on their behalf or under
16 its direction or control.

17 “IQS INC” means IQSystem, Inc. and any of its predecessors, successors, agents, assigns,
18 officers, directors, employees, or any individual or entity acting on their behalf or under its
19 direction or control.

20 “IQS LLC” means IQSystem LLC and any of its predecessors, successors, agents,
21 assigns, officers, directors, employees, or any individual or entity acting on their behalf or under
22 its direction or control.

23 “ELETTRANOVA” means Elettranova Engineering Inc. and any of its predecessors,
24 successors, agents, assigns, officers, directors, employees, or any individual or entity acting on
25 their behalf or under its direction or control.

26 “FAC” means the First Amended Complaint filed on April 6, 2015.

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1 “Any” and “each” include and encompass “all” and vice versa. “Or” includes and
2 encompasses “and”, and vice versa. The singular includes the plural, and vice versa. The
3 masculine includes and encompasses the feminine, and vice versa.

4 “DOCUMENT” and “DOCUMENTS” means a writing and includes without limitation
5 the following, whether printed, recorded or reproduced by any other mechanical process or
6 written or produced by hand, including drafts: agreements; communications; correspondence;
7 electronic mail; texts; instant messages; Facebook other social networking posts; telegrams;
8 memoranda; summaries, records or reports of telephone conversations, personal conversations,
9 interviews, meetings, conferences, investigations or negotiations; opinions or reports of
10 consultants; diaries; graphs; reports; notebooks; charts; plans; drawings; sketches; maps;
11 photographs; film; brochures; pamphlets; advertisements; circulars; press releases; drafts; letters;
12 faxes; any marginal comments appearing in any documents; tape recordings; electronic
13 transmissions; computer printouts and all other writings. A “DOCUMENT” is not limited in any
14 way as to the form of storage (such as paper, microfiche, magnetic tape, magnetic disk, CD-
15 ROM, DVD, optical disk, or other electronic-storage device). A draft or non-identical copy of a
16 DOCUMENT is a separate “DOCUMENT” within the meaning of this term.

17 “RELATING TO” means constituting, evidencing, embodying, referring to, comprising,
18 identifying, commenting on, describing, containing, reflecting, or relating to the subject matter.

19 “IDENTIFY,” as it relates to an individual, means to state the individual’s name, last
20 known business address, last known home address, last known business telephone number, last
21 known home phone number and all known electronic-mail addresses.

22 “COMMUNICATION” means, without limitation, the exchange or transmission of
23 words, ideas, or information from one or more persons to another person or persons, whether
24 accomplished person to person, by telephone, in writing, via facsimile, via electronic mail, or
25 through any other medium, and shall include but is not limited to discussions, conversations,
26 interviews, negotiations, conferences, meetings, speeches, memoranda, letters, correspondence,
27 notes, statements, questions, inquiries, dialogues, consultations, agreements, understandings and
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1 all other documents evidencing any verbal or nonverbal interaction, whether such contact was by
2 chance, prearranged, formal, or informal.

3 **INTERROGATORIES**

4 **INTERROGATORY NO. 1.**

5 IDENTIFY with specificity the venture capital fund referred to in paragraphs 27 and 28
6 of the FAC, and Investment Funds 1, 2, 3, 4 and 6, referred to in FAC paragraphs 94, 111, 113,
7 116 and 146.

8 **INTERROGATORY NO. 2.**

9 IDENTIFY with specificity Companies X and Z, referred to in FAC paragraphs 153 and

10 181.

Unduly Burdensome, Premature Contention Interrogatory, ACP/AWP, Calls for Loop
To Testify As To Ultimate Issue in the Case and to submit pretrial disclosures that are
not due until the Court issues a final pretrial submissions schedule.

11 **INTERROGATORY NO. 3.**

12 Explain all facts, communications, documents, witnesses and other bases for LOOP's
allegation that ALMAWAVE benefitted from any alleged wrongdoing of Anna Gatti.

13 **INTERROGATORY NO. 4.**

Lacks Relevance to any pending claim or defense, Calls
for ACP/AWP materials

14 Describe in detail any investigation conducted regarding potential claims against, or
potential wrongdoing committed by, ALMAWAVE, including but not limited to identifying the
date when any such investigation was conducted and who conducted the investigation.

15 **INTERROGATORY NO. 5.**

Premature Contention Interrogatory, ACP/AWP, Calls for Loop To Testify As To
Ultimate Issue in the Case and to submit expert disclosures that are not due under
the current scheduling order until March 2016.

16 Describe all bases for LOOP's claimed damages, including all bases for valuations of the
business or of LOOP's technology, trade secrets, patents, or confidential information

17 **INTERROGATORY NO. 6.**

18 Describe in detail LOOP's allegedly misappropriated trade secrets, confidential
information, and patent applications, including the allegedly misappropriated design details,
concepts, semantic analysis, and test results referred to in declarations from Patrick Ehlen and

19 Bart M. Peintner.

Unduly Burdensome, Premature Contention Interrogatory, ACP/AWP, Calls for Loop
To Testify As To Ultimate Issue in the Case and to submit pretrial a description of
numerous subjects that is beyond what is required by the rules, including the specific
rules applicable to claims for misappropriation of trade secrets. Loop AI will produce
an itemized list of its trade secrets in accordance with the applicable rules and will
identify any additional materials that has not already been identified in the filings
made in the proceeding.

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See objections to Interrogatory No. 3
supra.

1 **INTERROGATORY NO. 7.**

2 Explain all facts, communications, documents, witnesses and other bases for LOOP's
3 claim that ALMAWAVE's technology, trade secrets, patents, or confidential information are
4 similar to, or based on, LOOP's technology, trade secrets, patents, or confidential information.

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6 Dated: June 29, 2015

VENABLE LLP



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8 By:
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10 Thomas E. Wallerstein (SBN 232086)
11 Kimberly Culp (SBN 238839)
12 505 Montgomery Street, Suite 1400
13 San Francisco, CA 94111
14 twallerstein@venable.com
15 kculp@venable.com
16 Tel.: (415) 653-3750
17 Fax: (415) 653-3755
18 *Attorneys for Almawave USA, Inc.*

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26
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28
VENABLE LLP
505 MONTGOMERY STREET, SUITE 1400
SAN FRANCISCO, CA 94111
415-653-3750